THE LAW OFFICES OF

NEAL BRICKMAN, P.C.

420 LEXINGTON AVENUE, SUITE 2440 NEW YORK, NEW YORK 10170

NEAL BRICKMAN
JUDITH L. GOLDSBOROUGH
ETHAN Y. LEONARD
VIRIGNIA A. REILLY
JASON A. STEWART

TELEPHONE: (212) 986-6840

TELECOPIER: (212) 986-7691

Via ECF

Hon. Vernon S. Broderick United States District Court Southern District of New York 40 Foley Square, Room 415 New York, New York 10007

April 24, 2020

Re: Stanise v. Loria

Civ. No. 20-CV-02769(VSB)

Dear Judge Broderick:

Please allow this letter to serve as a motion seeking a request for an extension of time for the Defendant to Answer. My office represents the Plaintiff in this action. Following the service of the Complaint, Defendant, who is currently acting *pro se*, requested an extension of time to Answer to consider proposed settlement terms and/or to otherwise seek counsel to prepare a response to the pleadings. Accordingly, we prepared the accompanying stipulation and it was agreed that the Defendant's time to Answer, subject to this Court's approval, would thereby be extended to May 15, 2020. The Summons and Complaint having been served on April 8, 2020, Defendant's time to Answer was initially set for April 29, 2020. We are now making this request, the first such request, for an extension of time for Defendant to be able to answer on or before May 15, 2020. This request is made with the consent of both sides. Thank you for your attention to this matter.

Very Truly Yours,

/s/ Jason A. Stewart Jason A. Stewart (JS4602) Neal Brickman (NB0874)

cc:

Victor Loria 3625 NW 82 Avenue, Suite 402 Miami, FL 33166